

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYOVAC, INC.,)	
)	
Plaintiff/Counter-Defendant.)	Civil Action No. 04-1278
)	
vs.)	Hon. Kent A. Jordan
)	
PECHINEY PLASTIC PACKAGING,)	
INC.,)	
)	
Defendant/Counter-Plaintiff.)	

NOTICE OF RULE 30(b)(6) DEPOSITION OF CRYOVAC, INC. (No. 2)

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, defendant/counter-plaintiff Pechiney Plastic Packaging, Inc. ("Pechiney") will take the deposition of plaintiff/counter-defendant Cryovac, Inc. ("Cryovac") upon oral examination of the witness(es) designated by Cryovac as the person(s) most competent to testify on its behalf concerning the categories listed on attached Schedule A. The deposition shall be recorded by videotape and stenographic means and shall take place at the offices of Nelson Mullins, Poinsett Plaza, Suite 900, 104 South Main Street, Greenville, South Carolina 29601 beginning at 9:00 a.m. on April 5, 2005, or at such other place and time as may be agreed to by the parties.

In accordance with Rule 30(b)(6), Pechiney requests that Cryovac prepare its designee(s) to testify "as to matters known or reasonably available to" Cryovac regarding the subjects listed on attached Schedule A. Pechiney also requests that Cryovac provide Pechiney with written notice of at least five (5) business days before the deposition of the name and employment position of each person designated to testify on Cryovac's behalf, identifying the matters set forth in Schedule A as to which each person will testify.

The deposition, before a Notary Public or other person authorized by law to administer oaths, will continue from day to day until completed with such adjournments as to time and place as may be necessary. You are invited to attend and to cross-examine the witness.

Respectfully submitted,

PECHINEY PLASTIC PACKAGING, INC.

Dated: March 11, 2005

By: 
One of its Attorneys

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SCHEDULE A

1. Conception, actual reduction to practice and diligence towards actually reducing to practice the alleged inventions in each claim of the '419 patent, including but not limited to, for each act and all such activities, the date of the act or activities, the location the act or activities occurred, who performed or witnesses the act or activities and all documents that refer or describe these activities, including but not limited to laboratory notebooks, invention disclosures, invention records, and research reports.

2. All activities leading up to the conception and to the reduction to practice of any inventions claimed in the '419 patent.

3. The authenticity, contents, completeness, and accuracy of documents relating to matters set forth in paragraphs 1-2 above.

CERTIFICATE OF SERVICE

I, Brian P. O'Donnell, an attorney, hereby certify that I caused true and correct copies of
Notice of Rule 30(b)(6) Deposition of Cryovac, Inc. (No. 2) to be served on:

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This 11th day of March, 2005 via e-mail and regular mail.



Brian P. O'Donnell